



The State of New Hampshire

DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

June 11, 2026

Mark Sanborn, Regional Administrator
U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re: Commitment Letter Regarding NH State Implementation Plan Revision

Dear Administrator Sanborn:

On July 29, 2021, the New Hampshire Department of Environmental Services (NHDES) submitted a State Implementation Plan (SIP) revision to EPA which contained a maintenance plan for the Boston-Manchester-Portsmouth Area pertaining to the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS). The second 10-year maintenance plan covered 2023 through 2032 and included the Enhanced Motor Vehicle inspection and maintenance (I/M) program as a control measure to ensure attainment with the 1997 8-hour ozone NAAQS. EPA approved the SIP revision regarding the second 10-year maintenance plan on April 22, 2022. [\[87 FR 24058\]](#) On December 24, 2025, NHDES submitted a SIP revision to EPA requesting removal of the I/M program from the control measures portion of the SIP.

NHDES is addressing Clean Air Act (CAA) [Section 175A](#) regarding maintenance plans and specifically the contingency provisions. Section 175A(d) states "Each plan revision submitted under this section shall contain such contingency provisions as the Administrator deems necessary to assure that the State will promptly correct any violation of the standard which occurs after the redesignation of the area as an attainment area. Such provisions shall include a requirement that the State will implement all measures with respect to the control of the air pollutant concerned which were contained in the State implementation plan for the area before redesignation of the area as an attainment area."

NHDES commits in this letter to submitting a SIP revision to EPA no later than one year from the date of EPA approval of the December 24, 2025 I/M SIP revision in accordance with CAA Section 110(k)(4). The forthcoming SIP revision, which will include an opportunity for public comment, will consist of a letter requesting the I/M program be moved to the list of potential contingency measures portion of the maintenance plan pertaining to the 1997 8-hour ozone NAAQS to address the requirement of Section 175A(d).

Please contact Catherine Beahm, SIP Planning Administrator, at Catherine.A.Beahm@des.nh.gov or (603) 271-6793 if you need additional information or if you have any questions.

Sincerely,

Craig A. Wright
Director, Air Resources Division

ec: Lynne Hamjian, Director, Air & Radiation Division, EPA Region 1
Eric Wortman, Air & Radiation Division, EPA Region 1

www.des.nh.gov

29 Hazen Drive • PO Box 95 • Concord, NH 03302-0095
(603) 271-3503 • Fax: (603) 271-2867 • TDD Access: Relay NH 1-800-735-2964